

SWBT'S CHECKLIST PROVISIONING IN TEXAS*

No.	Checklist Description	Products Provided	Total
1	Interconnection	Interconnection Trunks Provided to CLECs** 1-Way 83,142 2-Way 266,488 Collocation Physical 655 Virtual 40	347,830 695
2	Unbundled Network Elements	Orders Processed Since February 1996 Manual 2,520,980 Electronic 1,189,800 Orders Processed During November 1999 Manual 99,031 Electronic 93,192	3,710,780 192,223
3	Poles, Ducts, and Conduits	Number of Poles Attached by CLECs Feet of Duct Occupied	4,782 1,470,085
4	Local Loops	Stand-Alone Unbundled Loops UNE Loop/Port Combos	40,695 125,572
5	Local Transport	Unbundled dedicated and shared transport available to CLECs	
6	Local Switching	Stand-Alone Unbundled Switch Ports	130
7	911/E911/DA/Operator Services	E911 Trunks DA/O Trunks CLECs Using DA Service CLECs Using "0" Call Completion E-911 Listings for End Users of Facilities-Based CLECs Residential 43,875 Business 241,782	400 1,340 102 98 285,657
8	White Pages	CLEC End User Listings Resale 378,240 Facilities-Based 12,378	 390,618
9	Numbering Administration	Telephone Numbers Provided to CLECs*** Numbers Assigned Numbers In Use	 11,180,000 3,250,000
10	Database/Signaling	Access to 800, LIDB, CNAM, AIN, and SS7 available to CLECs	
11	Number Portability	Ported Numbers In Service LNP 448,220 INP 6,321	 454,541
12	Dialing Parity	Local and intraLATA toll dialing parity available	
13	Reciprocal Compensation****	From SWBT to CLECs From CLECs to SWBT	1.45785B 1.28940B
14	Resold Access Lines	Resold Access Lines***** Residential 171,304 Business 150,847	 322,151

* Unless otherwise stated, data are as of 11/30/99.

** As of 1/31/99.

*** Provided to CLECs as of 12/1/99, when SWBT ceased to be Number Administrator in Texas.

**** Local and EAS minutes of use exchanged over interconnection trunks, 1/97 through 10/99. In addition, SWBT has sent 17.1 billion minutes of Internet traffic to CLECs.

***** Excludes coin lines.

COMPARISON OF THE TEXAS AND NEW YORK SECTION 271 APPLICATIONS

1. Indicators of Irreversible Competition

Access lines served by CLECs

	<u>Total</u>	<u>Facilities-based</u>	<u>Resale</u>
Texas:	1.4 million	1.1 million	322,000
New York:	1.1 million	804,000	315,000

Residential lines served by CLECs

Texas:	244,000 (through Oct. 1999)
New York:	237,000

Business lines served by CLECs

Texas:	1.1 million (through Oct. 1999)
New York:	882,000

Approved interconnection agreements

Texas:	237
New York:	74

Facilities-based CLECs

Texas:	48
New York:	35

Resellers

Texas:	114
New York:	65

2. Interconnection

Collocation

- **Completed arrangements**

	<u>Physical</u>	<u>Virtual</u>	<u>Total</u>
Texas:	655	40	695
New York:	750	26	776

- **Timeliness**

Texas: 100% of physical collocation arrangements delivered within 90 calendar days.

New York: 95% of installations completed within 76 business days.

Interconnection trunks

- **Installed trunks**

Texas: 348,000

New York: 349,000

- **Blockage**

Texas: Meeting Texas PUC benchmark.

New York: Performance data showed parity.

- **Installation timeliness**

Texas: Meets benchmark of 20 business days.

New York: Provides parity (27 to 42.3 days).

3. OSS

Pre-Ordering

- **Total number of transactions**

Texas: 3.7 million

New York: 1.3 million

- **Choices of interfaces**

Texas: 4 choices

New York: 2 choices

- **Response time for retrieval of customer service records**

Texas: CLEC interfaces same as or faster than SWBT retail.

New York: EDI sometimes missed “parity plus four seconds” standard.

Ordering

- **Orders processed monthly**

Texas: 192,000

New York: 90,000

- **Choices of interfaces**

Texas: 4 choices

New York: 2 choices

- **Flow-Through rates**

Texas: Over 97% for CLECs vs. 92% for SWBT retail.

New York: Systems “capable of providing high levels of order flow-through.”

- **Mechanized order confirmations**

Texas: 99% within 5 hours for simple business, resale, and 1-50 UNE loop orders.

New York: “Generally meets” benchmark of 95% within 2 hours.

4. Loops

Number of uncombined loops provisioned

Texas: 40,695

New York: 50,000

xDSL loops

Texas: 960 (in service)

New York: 1,165 (provisioned)

Installation timeliness

Texas: Meeting 3-10 day installation intervals for most loop types.

New York: Average completion times of 5-7 days exceed retail intervals.

Hot cuts

Texas: 92-100% of orders have average loop completion time of less than one hour.

Bell Atlantic: 88-94% within benchmark of 1-8 hours.

5. UNE Platform

Number of pre-combined loop/port “UNE Platforms” provisioned

Texas: 125,600

New York: 152,000

Installation

Texas: Parity with retail.

New York: Parity with retail.

6. Number Portability

Texas: 448,000 (via long-term method)

New York: 180,000

7. Performance Monitoring and Enforcement

Reported submeasures

Texas: 1,874

New York: 584

Liability

Texas: Up to \$289 million at risk (9.6 million local access lines)
36% of Net Return

New York: Up to \$269 million at risk for (11.4 million local access lines)
36% of Net Return

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Application by SBC Communications, Inc.,)	
Southwestern Bell Telephone Company,)	
And Southwestern Bell Communications)	CC Docket No. _____
Services, Inc. d/b/a Southwestern Bell Long)	
Distance for Provision of In-Region)	
InterLATA Services in Texas)	

**DECLARATION AND VERIFICATION OF PAUL M. MANCINI
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SBC COMMUNICATIONS INC.**

1. I, Paul K. Mancini, am a Vice President and Assistant General Counsel for SBC Telecommunications, Inc. I am authorized to make this declaration on behalf of SBC Communications, Inc.


2. I have reviewed the foregoing Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Long Distance for Authorization To Provide In-Region, InterLATA Services in Texas, and the materials filed in support thereof.

3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

4. I further certify that SBC Communications Inc., is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 4, 2000.



Paul K. Mancini

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Application by SBC Communications, Inc.,)
Southwestern Bell Telephone Company,)
And Southwestern Bell Communications)
Services, Inc. d/b/a Southwestern Bell Long)
Distance for Provision of In-Region)
InterLATA Services in Texas)

CC Docket No. _____

**DECLARATION AND VERIFICATION OF ANN E. MEULEMAN
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SOUTHWESTERN BELL TELEPHONE COMPANY**

1. I, Ann E. Meuleman, am a General Counsel of Southwestern Bell Telephone Company. I am authorized to make this declaration on behalf of Southwestern Bell Telephone Company.

2. I have reviewed the foregoing Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Long Distance for Authorization To Provide In-Region, InterLATA Services in Texas, and the materials filed in support thereof.

3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

4. I further certify that Southwestern Bell Telephone Company, is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

5. I declare under penalty of perjury that the foregoing is true and correct.
Executed on January 4, 2000.



Ann E. Meuleman

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Application by SBC Communications, Inc.,)	
Southwestern Bell Telephone Company,)	
And Southwestern Bell Communications)	CC Docket No. _____
Services, Inc. d/b/a Southwestern Bell Long)	
Distance for Provision of In-Region)	
InterLATA Services in Texas)	

**DECLARATION AND VERIFICATION OF TOM WECKEL
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF SOUTHWESTERN BELL COMMUNICATIONS SERVICES
(d/b/a SOUTHWESTERN BELL LONG DISTANCE)**

1. I, Tom Weckel, am Director-Regulatory Affairs of Southwestern Bell Communications Services (d/b/a Southwestern Bell Long Distance) ("SBLD"). I am authorized to make this declaration on behalf of SBLD.

2. I have reviewed the foregoing Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Long Distance for Authorization To Provide In-Region, InterLATA Services in Texas, and the materials filed in support thereof.

3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

4. I further certify that SBLD is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 4, 2000.


Tom Weckel

REQUIRED STATEMENTS

1. Confidential Materials Filed with the Commission Under Seal

The confidential materials supporting this Application have not been included in the electronic version of the Application.

Inquiries relating to access (subject to the terms of any applicable protective order) to confidential information submitted by Southwestern Bell in this Application should be addressed to:

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2. Internet Posting

Portions of this Application are available on the Internet at <<http://www.sbc.com/>>.

3. Status of Interconnection Agreements

SWBT's Texas PUC-approved interconnection agreements, together with the dates on which they were approved by the Texas PUC, are listed in Attachment B to the Affidavit of John S. Habeeb (App. A, Pt. A-1, Tab 1). Numerous agreements are reproduced in Appendix B of this Application.

The status of federal court challenges to SWBT's Texas interconnection agreements pursuant to 47 U.S.C. § 252(e)(6), and the CLEC parties to those cases, are as follows:

AT&T, e.spire, MCI, MFS, Teleport: SWBT v. AT&T Communications of the S.W., Inc., No. 98-51005 (consolidated with Nos. 99-50060 & 99-50073) (5th Cir. filed Oct. 20, 1998). Motion filed by SWBT to withdraw appeal, Oct. 20, 1999; motion granted, Oct. 21, 1999.

Fibrcom, Time Warner: SWBT v. Public Util. Comm'n of Tex., No. 98-50787 (5th Cir. argued Dec. 6, 1999).

Golden Harbor: SWBT v. Golden Harbor of Texas, Inc., No. 98-CV-475 (W.D. Tex. filed July 24, 1998). Pending, not yet argued.

MCI: MCI Telecomms. Corp. v. SWBT, No. 98-CV-836 (W.D. Tex. filed Dec. 30, 1998). Order issued granting motion to dismiss MCI's second amended complaint, and remanding appeal of Docket No. 19075 to the Texas PUC, on Oct. 25, 1999.

Waller Creek: SWBT v. Waller Creek Communications, Inc., No. 99-50752 (5th Cir. filed Aug. 6, 1999). Pending, not yet argued.